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Van Turner, Esq. - TN

EXECUTIVE DIRECTOR

Helen L. Holton, CPA, MBA

660 North Capitol St, NW
Suite 400
Washington, DC 20001
Phone: (202) 350-6696
Fax: (202) 380-0222
Email: support@nobco.org
www.nobco.org

December 3, 2018

The Honorable Ajit Pai, Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: Twilio Petition: WT Docket No. 08-7

Dear Chairman Pai,

The National Organization of Black County Officials (NOBCO) serves more than 3,000 black elected and appointed county officials across the 3,242 counties and county-equivalents that exist in America today. NOBCO provides services as an information clearinghouse for organizational concerns and provides a programmatic and project structure to educate, train and assist government officials and community leaders.

Where we once only used our phones for voice calling, many communities now make significant use of text messaging. Consumers are able to use text messaging to add a different dimension to wireless communications that have become second-nature in the United States today. It has become as essential to smartphone usage as access to e-mail. Text messaging provides consumers with a level of convenience and trust to reach others.

Economic development and community protection are two of NOBCO's key priorities. Wireless messaging is a tool for developing communities, but we cannot allow this service to be utilized to abuse our constituents with the threat of unwanted spam or fraudulent text messages. There are strong public policy reasons for spam filter technology to ensure we are only getting the messages we wish to receive. Filtering helps maintain the level of trust subscribers have in their texting experience and helps wireless carriers maintain and protect their subscribers.

We agree with the Federal Communications Commission's proposed order to ensure messaging remains a protected environment for NOBCO's constituents. This would allow wireless companies to continue their service by filtering out fraudulent or unwanted text messages that their customers do not want. Twilio wants to place text messaging under a regulatory regime that would upend the benefits of text messaging and expose us to new harms. The Commission should take the opportunity to declare current industry practice as sound public policy and deny Twilio's petition.

Sincerely,

Dr. Helen Holton
Executive Director
National Organization of Black County Officials, Inc.